

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the  
Southern District of Texas

United States District Court  
Southern District of Texas  
FILED

OCT 25 2011

David J. Bradley, Clerk

United States of America )

v. )

Lorenzo Guzman )

DOB: 1976 )

US Citizen )

Case No.

M-11-2941-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 10/24/2011 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 USC 922(g)(1)

possession of a firearm by an individual having been convicted  
of a felony

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.

*approved for filing*  
*[Signature]*  
AUSA

*[Signature]*  
Complainant's signature

Kevin D. Brown - ATF Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

10/25/11

*[Signature]*  
Judge's signature

City and state:

McAllen, Texas

U.S. Magistrate Judge Brian Owsley

Printed name and title

ATTACHMENT A

I, Special Agent Kevin D. Brown, affiant, do hereby depose and state the following:

I am a Special Agent of the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). I have been a law enforcement officer since April 2009.

1. My duties include the investigation of violations of the Federal firearms laws. I know it to be unlawful for any person who has been convicted of a crime punishable by more than one year in prison to possess a firearm.
2. On October 20, 2011, ATF Agents interviewed three individuals who stated that they had purchased firearms for Lorenzo GUZMAN. All three individuals stated that they had been paid by GUZMAN to make these straw purchases. Later on October 20, 2011, one of the aforementioned individuals placed a recorded phone call to GUZMAN stating that he had found another individual willing to provide GUZMAN with firearms. GUZMAN stated that he wanted the firearms as soon as possible.
3. On October 21, 2011, the same aforementioned cooperating defendant (CD) placed additional recorded calls to GUZMAN. GUZMAN stated that he wanted two AR 15 rifles. GUZMAN and the CD agreed on a price of \$800 for each rifle. GUZMAN and the CD also agreed that the rifles would be transferred on Monday October 24, 2011.
4. Lorenzo GUZMAN is a person having been convicted of Failure to Comply with Sex Offender Registration (felony) and Manufacture/Delivery of a Controlled Substance (felony). GUZMAN was convicted of both offenses on 09-03-2009.

---

ATTACHMENT A

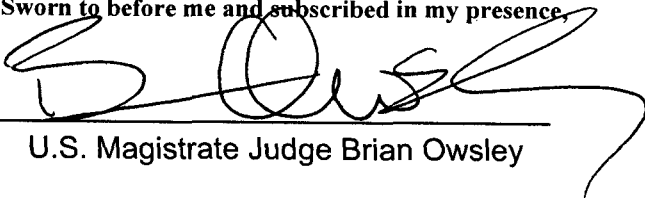
5. On October 24, 2011, the CD placed another recorded call to GUZMAN to finalize a meeting location. The undercover ATF Agent also placed a recorded call to GUZMAN. GUZMAN agreed to meet with the CD and the undercover agent in Pharr, TX.

6. Later on October 24, 2011, GUZMAN met with the CD and the undercover agent in Pharr, TX. GUZMAN inspected two firearms and transferred them from the undercover vehicle into his own vehicle. After GUZMAN took possession of the firearms he was arrested by ATF Agents. GUZMAN was in possession of two AR 15 type rifles. A Bushmaster, Model XM15-E2S, .223 caliber rifle, Serial Number: BFI637734 and a Bushmaster, Model XM15-E2S, .223 caliber rifle, Serial Number: BFI637602.



Kevin D. Brown - ATF Special Agent

Sworn to before me and subscribed in my presence,



U.S. Magistrate Judge Brian Owsley

10/25/11  
Date